UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

September 7, 2010

Mr. Jeffrey D. Graham, PE
Operations Engineer
Federal Highway Administration
530 Center Street N.E., Suite 100
Salem, Oregon 97301

Re: Sellwood Bridge SE Tacoma Street and Oregon 43, Multnomah County, Oregon Final Environmental Impact Statement and Final Section 4(f) Evaluation, EPA Project # 06-068-FHW.

Dear Mr. Graham:

The U.S. Environmental Protection Agency has reviewed the Sellwood Bridge Final Environmental Impact Statement and Draft Section 4(f) Evaluation (FEIS), Multnomah County, Oregon. Our review of the FEIS was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The FEIS identifies Alternative D Refined as the preferred alternative. This alternative seeks to address public and agency comments on the draft EIS and minimize environmental impacts. In our comments on the Draft EIS, we raised questions and made recommendations relative to air quality impacts during construction, ground water impacts, and noise impacts to aquatic species, and habitat mitigation. We are pleased to see that many of these topic areas have received additional treatment in the FEIS. We note, however, that our comments on the DEIS do not appear to have been incorporated or responded to in the FEIS. We apologize if this was an administrative oversight on our part.

In spite of the omission of our comments on the DEIS, EPA has been party to early and ongoing agency coordination on this project through the Collaborative Environmental and Transportation Agreement for Streamlining (CETAS) process, and we feel that our concerns have in large part been addressed. We will include as an attachment to this letter two lists of mitigation measures that we enclosed with our comments on the Draft. We would appreciate your consideration of these measures, particularly as the pollution control plan submitted by the Contractor is reviewed.

We appreciate your efforts in preparing this FEIS and we're grateful for the opportunity to review it. If you have questions or would like to discuss our comments, please contact Teresa Kubo of my staff at (503) 326-2859. Thank you for involving us in the Sellwood Bridge project.

Sincerely,

Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

Enclosures

Mitigation Measures to Reduce Emissions During Construction

- Properly maintain construction equipment.
- Evaluate the use of available alternative engines and diesel fuels:
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    - Engines using fuel cell technology
    - Electric engines
    - Engines using liquefied or compressed natural gas
    - Diesel engines that meet the proposed EPA 2007 regulation of 0.01 g/bhp-hr (grams per brake horsepower hour)
    - Diesel engines outfitted with catalyzed diesel particulate filters and fueled with low sulfur (less than 15 ppm sulfur) fuel
    - Diesel engines fueled with biodiesel (diesel generated from plants rather than petroleum)
    - Fueling on-site equipment, e.g., mining equipment, with lower sulfur highway diesel instead of off-road diesel fuel

- Reduce construction-related traffic trips and unnecessary idling of equipment.
- Use newer, "cleaner" construction equipment.
- Install control equipment on diesel construction equipment (particulate filters/traps DPTs, oxidizing soot filter, oxidation catalysts, and other appropriate control devices to the greatest extent that is technically feasible.) A particulate filter ("P-trap" or oxidizing sort filter) may control approximately 80% of diesel PM emissions. An oxidation catalyst reduces PM emissions by only 20%, but can reduce CO emissions by 40%, and hydrocarbon emissions by 50%. Different control devices may be used simultaneously.
- Reroute the diesel truck traffic away from communities and schools.
- Adopt a "Construction Emissions Mitigation Plan (CEMP). A CEMP would help to ensure that the procedures for implementing all proposed mitigation measures are sufficiently defined to ensure a reduction in the environmental impact from diesel PM and NOx due to the project's construction. CEMP inclusions:
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    - All construction-related engines are tuned to the engine manufacturer's specifications in accordance with the timeframe recommended by the engine manufacturer; not idle for more than 5 minutes; not tampered with in order to increase engine horsepower; include particulate traps, oxidation catalysts and other suitable control devices on all construction equipment used at the construction site; and use diesel fuel having a sulfur content of 15 ppm or less, or other suitable alternative diesel fuel. Minimize construction-related traffic trips through appropriate policies and implementation measures.

    - Implement an adaptive mitigation measure program over the project's construction phase.